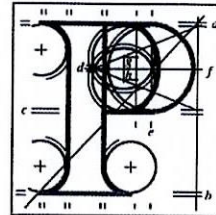


Our Case Number: ABP-317265-23



**An
Bord
Pleanála**

Ray Ryan
BMA Planning
Taney Hall
Eglinton Terrace
Dundrum
Dublin 14
D14 C7F7

Date: 02 August 2023

Re: Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works.
Townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield) and others, Co. Waterford.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.


The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,



Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA04

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902.

28/07/2023

Ref: Bord Pleanála Case reference: PA93.317265
**Re: Wind Farm Development including 12 turbines and all associated works
at Dyrick Hill, Co. Waterford**
Applicant: Dyrick Hill Wind Farm Limited.

Dear Sir/ Madam,

I wish to submit an observation in relation to the Strategic Infrastructure Development application for a wind farm development at Dyrick Hill Windfarm, lodged on 02/06/2023 by Dyrick Hill Wind Farm Limited in the townlands of Ballynaguilkee Upper, Broemountain, Corradoon, Dyrick, Lickoran, Lickoranmountain, Lisleagh, Lisleaghmountain, Lyrattin and Scartmountain, Co. Waterford.

The Bord Pleanála Case reference is : PA93.317265 (The Bord Pleanála Case reference for SID Consultation was PC93.312434 (by EM Power Limited)).

Background

I am making this submission on my own behalf as a resident (E91 Y016) and a member of the local community. I have worked as a planning consultant for the past 25 years and, during that time, have acted for and against windfarm projects for both promoters and private stakeholders. I am also co-founder and chairperson of Touraneena Village Improvement Initiative which was established in 2011 and which works on a range of community initiatives and infrastructure projects in Touraneena Village which is the centre of the local community and the only designated settlement in the parish in which the proposed development is situate.

I reviewed the planning application with an open mind, however, on reviewing this planning application, for the reasons summarised below, I submit that An Bord Pleanala should refuse permission for this development.

Material Contravention of Development Plan

I believe that An Bord Pleanála should uphold the recently adopted County Development Plan which is clear and unambiguous in relation to the suitability of the proposed development at this particular location.

The proposed development is contrary to the Development Plan and that could not be clearer in this instance. The Wind Strategy enshrined in the WCCDP¹, which has been carefully evolved over the last two decades based on a detailed analysis and understanding of the wind capacity of the County, designates the area as a 'No go' area.

Faced with the fact that the development is a Material Contravention of the Development Plan, the applicants case for the project returns to the broad brush strokes of global and national energy statistics. The case is therefore very weak.

The 2022 WCCDP was prepared with full knowledge of the Dyrick Hill Wind Farm proposal and the Chief Executive's Reporting on the Development Plan responded and explained in detail the rationale for the development plan proposals for this area. I endorse the thrust of the assessment and recommendation of the WCCC Chief Executive in the context of the Development Plan and in the context of this particular planning application.

Visual Impact

Chapter 11 of the EIAR for the Development, addresses the Landscape and Visual impact and lacks appreciation of the landscape impact as it is and will be perceived by the local community. The selection of photomontage views is more notable for the views that it does not include and is particularly notable for the cursory way in which it addresses the impacts from the only designated settlement within the immediate vicinity ie. Touraneena Village.

The view westwards towards Dyrick-Broe-Monatouk Mountains from Touraneena Village defines the place. It is the view and backdrop that defines what people see from the Church, the National School, the Community Centre and the GAA Pitch. It also dominates the views from for the full length of the R672 (Beary's Cross to The Halfway House) and on various locals roads east and west of the regional road. The impact on these views is beyond what the local landscape can absorb without disproportionate long term impacts.

¹ Waterford City and County Development Plan 2022-2028

Turbine Number and Layout

I would strongly disagree with the applicant contention that '*The layout of the Development presented in the Planning Application and EIAR represents the optimum fit with the technical and environmental parameters of this project*' (Planning Report Section 6.0, Conclusion). From even a cursory inspection and based on knowledge of this location, it appears that the layout is mainly informed by putting as many turbines as possible within the land ownership boundaries available to the applicants. The 12no. large 185m turbines are excessive and the proposals which encroach into the most elevated parts of the site to the west in the surrounds of the summit of Broemountain which are classified with the 'Most Sensitive' are particularly jarring and unsuitable.

Duration of Permission

A fifteen year duration of permission is without basis and speaks to the somewhat dubious economic basis for projects and what might be termed "subsidy mining" for wind farm developments or "banking" permissions as a long term investment strategy. If the applicants' have time on their side, then they should follow the "plan-led" approach that now characterises our planning system and amend the County Development Plan.

Justification for 185m Turbines

Wind Turbines continue to get larger and the proposed 185m turbines are the largest that are currently being employed in Ireland. For most of their presence on the Irish landscape wind farms have been typically 70-120 meter turbines and people are often surprised to learn that their perception was formed by a turbine that was actually half the size of the ones that being proposed. For example, the local community is familiar with a single smaller wind turbine at Caherbrack which has assimilated and has been well received. Therefore, the scale of these very large 185m turbines is not immediately apparent to most people until they find themselves in the midst of them. The fact that there would be 12 of them in this instance compounds this sense and, in my opinion, is beyond the absorptive capacity of the landscape and the local community in this instance.

While by no means the only deficiency in the EIA, the failure to justify the 185m turbines and to fully consider "Alternatives" around the number and the size of the turbines proposed is noted.

Community Benefit

Details on the Community Benefits and there has been no meaningful engagement with the local community on the details of how material benefits would be accessed by local community groups. The application is loaded with the generic benefits of wind energy to the planet but the applicants fail to make any specific references to tangible local benefits to the community. While the development will be seen from far and wide, the Dyrick Windfarm is primarily situate and will therefore primarily affect the area that is very well locally defined and identified as "Touraneena Parish" or the district of Sliabh gCua. There is little information in the planning application or on the ground that the local community has been engaged or why this change in the local environment would be mitigated in terms of "community benefit".


Ecology

I trust that the normal considerations and environmental impact will be fully considered in this case including birds, soil stability, noise, flicker assessment, construction traffic, aviation lighting at night etc.

Conclusion

I do not feel that an oral hearing is a productive use of the Board's resources in this instance and therefore do not formally request one. I do look forward within interest to your decision in due course. The required fee (€50) has been paid.

Yours sincerely,



Ray Ryan
BMA PLANNING
ray@bmaplanning.ie